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American Public Works Assoc.  
American Red Cross  
Archer -Daniels-Midland  
Associated Fire Fighters of IL  
Central Management Services  
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Cities of Champaign-Urbana  
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Cook County ESDA  
Department of Homeland Security/FEMA-Region V  
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Governor's Office  
IL Assoc. of Chiefs of Police  
IL Assoc. of Public Health Administrators  
IL Assoc. of School Boards  
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IL Campus Law Enforcement Administrators  
IL College of Emergency Physicians  
IL Coroners Association  
IL Department of Agriculture  
IL Department of Corrections  
IL Department of Military Affairs  
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IL Department of Transportation  
IL Education Association  
IL Emergency Management Agency  
IL Emergency Services Management Assoc.  
IL Environmental Protection Agency  
IL Firefighters Association  
IL Fire Chiefs Association  
IL Fire Services Association  
IL Fire Service Institute  
IL Health Care Association  
IL Law Enforcement Alarm System  
IL Law Enforcement Training & Standards Bd.  
IL Municipal League  
IL National Emergency Number Association  
IL Office of the State Fire Marshal  
IL Public Health Mutual Aid System  
IL Security Chiefs Association  
IL Sheriffs Association  
IL State Police  
IL States Attorneys Association  
Kane County ESDA  
Lake County ESDA  
Metro East (St. Clair-Madison)  
Mutual Aid Box Alarm System  
Quad Cities (Moline-E. Moline-Rock Island)  
Regional Superintendents of Schools  
School Crisis Assistance Team  
Secretary of State Police  
State Board of Higher Education  
U.S. Attorney's Office  
Will County EMA

#### Committees

Bioterrorism  
Chicago/Cook County UASI Workgroup  
Communications  
Crisis Response & Prevention  
Emergency Management Workgroup  
Fire Mutual Aid  
Information Technology  
Law Enforcement Mutual Aid  
Private Sector  
Public Information  
Science & Technology  
Training  
Transportation  
Volunteers and Donations

## ITTF POLICY STATEMENT 2008 (2)

To: Homeland Security Grant Program (HSGP)  
and Infrastructure Protection Program Grantees

FROM: Mike Chamness, Chair  
Illinois Terrorism Task Force 

DATE: March 19, 2008

SUBJECT: ITTF Policy Statement Regarding Requirements for  
Use of HSGP Training Funds

### INTRODUCTION

Governor's Executive Order 2003 (17) created the statewide homeland security advisory committee, the Illinois Terrorism Task Force (ITTF). The ITTF is responsible for developing and helping to implement the state's homeland security strategy as an advisory body to the Governor and overseeing the management and administration of the Homeland Security Grant Program. The task force continues to build upon a strong foundation of established working partnerships among its more than 60 members, which represent all public safety agencies and associations and every community in Illinois.

### GENERAL POLICY STATEMENT

With the release of Information Bulletin 144 on December 17, 2004, the U.S. Department of Homeland Security (DHS) established requirements that Homeland Security Grant Program (HSGP) recipients must follow for the use of training funds. Annually, DHS clarifies the use of training funds through the release of the annual HSGP guidance. The guidance provides a comprehensive protocol for the use of training funds for the applicable federal fiscal year. The purpose of this policy statement is to clarify the allowable use of training funds by recipients of ITTF grant funding (referred to as sub-recipients). Failure to comply with this policy statement or conditions outlined in the program guidance may result in the forfeiture or return of DHS funds to the ITTF.

### DEFINITION OF TRAINING

For the purposes of this policy statement, training is defined as the use of U.S. Department of Homeland Security, Homeland Security Grant Program, and Infrastructure Protection Program funding to support costs associated with:

1. the delivery of courses or programs that have been developed for and/or delivered by institutions and organizations funded directly by the Federal Emergency Management Agency (FEMA),
2. support of federal- or state-sponsored courses that have been approved for institutionalization by DHS, and
3. support of sessions coordinated and approved by the State Administrative Agency (SAA) that fall within the FEMA mission scope to prepare state and local personnel to prevent, protect against, respond to, and recover from acts of terrorism or catastrophic events.

Educational sessions (such as workshops, conferences, advisory board or task force meetings), instructional events on the use of a specific piece of equipment by a vendor, and programs to present time-sensitive, dynamic information that are not based on a set curriculum or have a prerequisite for participation are considered planning activities and not covered by the requirements of this policy statement.

## **TYPES OF TRAINING COURSES**

Sub-recipients may use funds to support allowable training costs (outlined under Allowable Training Costs section below) for the following types of courses:

1. Courses provided by FEMA (list found at [https://www.firstrespondertraining.gov/odp\\_webforms/](https://www.firstrespondertraining.gov/odp_webforms/))
2. Courses that are listed in the federal- or state-sponsored course catalog (list found at [https://www.firstrespondertraining.gov/odp\\_webforms/](https://www.firstrespondertraining.gov/odp_webforms/))
3. Courses that aren't provided by FEMA and aren't in the federal- or state-sponsored course catalogs but meet the following criteria:
  - Fall within the FEMA mission scope to prepare State and local personnel to prevent, protect against, respond to, and recover from acts of terrorism and catastrophic events.
  - Build additional capabilities that a) support a specific training need identified by the State and Urban Area, and b) comport with the State or Urban Area Homeland Security Strategy.
  - Address specific tasks and/or competencies articulated in FEMA's *Emergency Responder Guidelines* and the *Homeland Security Guidelines for Prevention and Deterrence*.
  - Address specific capabilities and related tasks articulated in the September 2006 version of the Target Capability List.
  - Support the specific program training activities identified in the individual HSGP grant programs for which the funding will be used.
  - Comport with all applicable Federal, State, and local regulations, certifications, guidelines, and policies deemed appropriate for the type and level of training.

## ALLOWABLE TRAINING COSTS

Allowable training-related costs include, but are not limited to, the following:

- Funds used to develop, deliver, and evaluate training, including costs related to administering the training, planning, scheduling, facilities, materials and supplies, reproduction of materials, and equipment.
- Overtime and Backfill costs associated with attending or teaching FEMA-sponsored and/or approved training courses and programs are allowed. These costs are allowed only to the extent the payment for such services is in accordance with the policies of the State or unit(s) of local government and has the approval of the State or the awarding agency, whichever is applicable. In no case is dual compensation allowable. That is, an employee of a unit of government may not receive compensation from both their unit or agency of government AND from an award for a single period of time (e.g., 1:00 pm to 5:00 pm), even though such work may benefit both activities. Further, overtime costs associated with employees who participate in training in a teaching role for which they are compensated are not allowed. Fringe benefits on overtime hours are limited to Federal Insurance Contributions Act (FICA), Workers' Compensation and Unemployment Compensation.
- Travel costs (e.g., airfare, mileage, per diem, hotel) are allowable as expenses by employees who are on travel status for official business related to approved training.
- Hiring of Full or Part-Time Staff or Contractors/Consultants to support training-related activities. Payment of salaries and fringe benefits must be in accordance with the policies of the State or unit(s) of local government and have the approval of the State or awarding agency, whichever is applicable. Such costs must be included within the funding allowed for program management personnel expenses, which must not exceed 15 percent of the total allocation as specified in the FFY2008 Homeland Security Grant Program Guidance and Application Kit. In no case is dual compensation allowable (see above).
- Certification/Recertification of Instructors is an allowable cost. States are encouraged to follow the FEMA Instructor Quality Assurance Program to ensure a minimum level of competency and corresponding levels of evaluation of student learning. This is particularly important for those courses that involve training of trainers. This information is contained in an information bulletin issued in October 2006.

## SUBMISSION OF WEB-FORMS

Starting with Federal Fiscal Year (FFY) 2006 grant funds, DHS grant guidance began requiring recipients of HSGP funding to document all courses for which training funds are used by entering information into Web-Forms, an electronic form/data management system. States and Urban Areas are required, within 30 days after attendance, to submit information for Web-Forms on all training supported with HSGP funds. Failure of the grantee to submit the Web-Forms information within 30 days will result in the disapproval of all training expenses associated with the training course. Web-Forms information consists of course title, course description, mission

area, level of training, the training provider, the date of the course, the number and associated disciplines of attendees, and the sponsoring jurisdiction. Organizations delivering/attending a

high volume of training courses with HSGP funds are given administrative rights to enter Web-Forms on behalf of Illinois' SAA—the ITTF. Other organizations should submit their information to the ITTF, who will then submit the Web-Form to DHS through the designated portal.

In support of the continuing effort to build common catalogs of approved training not provided by FEMA, the SAA will be allowed three deliveries of the same course within a state before the course is required to go through the FEMA state course review and approval process. Additional course deliveries will be authorized during the review period. However, if the course is disapproved as part of the process, no additional FEMA funds can be dedicated to attending the course. Additional information in the FEMA state course review and approval process can be found on page C-6 of the FFY2008 Homeland Security Grant Program Guidance and Application Kit.

#### **EFFECTIVE DATE OF POLICY**

This policy is effective for the use of FFY2006 and later HSGP funding.